

To The Commission:

I believe that Mr. Zook has erroneously taken the second sentence of 97.119(a) out of the context of the paragraph by ignoring the first sentence, which clearly defines the identification requirement and purpose.

Mr. Zook's construct would require that each and every "transmission", not just each "communication", be accompanied by the transmitting station's call sign.

The stated purpose of the identification includes the phrase "those receiving the transmissions" which is general enough to include stations which may be monitoring for enforcement purposes. Adding a requirement that the transmitting station include their call sign at the beginning would not significantly increase the likelihood that the monitoring station would intercept the call sign. Indeed, Mr. Zook's suggested wording that "the identification at the end of such a series may be omitted when the duration of the entire series is less than three minutes" would significantly decrease the likelihood that the monitoring station would intercept the call sign.

Emergency and emergency-training nets are often run as 'directed' nets where all communications are made between the net control station and an individual net member. To achieve brevity when calling a station, only the tactical call sign of the net member is used -- either by the net control station when calling the member or by the member when calling the net control station. In emergency nets, the tactical call sign is far more important to the communications system than the FCC call sign because it clearly and immediately identifies the function of the station. Adding a requirement that BOTH FCC call signs be included at the beginning of communication by BOTH parties would slow the traffic flow, add useless syllables, and require that ALL parties know the FCC call signs of ALL other parties.

Mr. Zook's suggested wording includes a requirement that each calling station transmit the FCC call sign of the station being called. This requirement could seriously reduce the amount of 'friendly chitchat' between casual acquaintances that haven't memorized the other person's FCC call sign and don't have ready access to a reference list.

Mr. Zook implied that he generally agreed with the Commission's simplification of the rules and since he only found a problem with the first and second sentences of 97.119(a) being in conflict, perhaps the simplest solution is to remove the second sentence.

On the other hand, it would be far simpler to dismiss the petition.

Thank you,

John C. Swift
402 Shelden Ave
Houghton, MI 49931-2138
Amateur Call Sign N8WAV
MARS Call Sign AAR5LD